

Message

From: Camilla Lindrum Bay [Camilla.Bay@sktst.dk]
Sent: 4/12/2023 2:49:04 PM
To: PFI002@politi.dk
Subject: Orientering vedr. forlig
Attachments: skrivelse til NSK 120423.pdf

Kære Per

Se venligst vedhæftede skrivelse vedr. Skattestyrelsen forlig fra maj 2019.

Venlig hilsen

Camilla Lindrum Bay
Chefkonsulent
Ledelsessekretariat Særlig Kontrol

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Skattestyrelsen
Engelholm Allé 1, 2630 Taastrup
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Sådan behandler vi persondata
Skattestyrelsen er en del af Skatteforvaltningen

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Returadresse: Skatteforvaltningen, Nykøbingvej 76, 4990 Sakskøbing

National enhed for Særlig Kriminalitet (NSK)

Ejby Industrivej 125-135

2600 Glostrup

Att: chefanklager Per Füg

Mail sendt til: PFI001@politi.dk

Ledelsessekretariat
Særlig Kontrol

Helgeshøj Allé 9
2630 Taastrup

Telefon 72 22 18 18
Skat.dk

Dato: 12. april 2023

Vedr. Skatteforvaltningens forlig med visse parter i udbyttesagen

Kære Per Füg

Som tidligere løbende oplyst indgik Skatteforvaltningen den 28. maj 2019 en forligsaftale med visse parter i udbyttesagen (i forligsaftalen "Covered Parties") for at løse de krav, der var opstået som følge af indgivelse af formodede uberettigede ansøgninger om refusion af udbytteskat. SØIK blev i forbindelse med forligets indgåelse informeret om aftalen, herunder specifikke vilkår relevante for SØIK.

Den 24. marts 2023 har to af forligsparterne stævnet Skatteforvaltningen ved District Court, i Southern District of New York, med påstand om, at Skatteforvaltningen har overtrådt forligsaftalen ved ikke at give visse oplysninger til SØIK.

Skatteforvaltningen har, som nævnt løbende informeret SØIK (nu NSK) om de oplysninger der kræves i henhold til forligsaftalen, men retter uanset på ny henvendelse med henblik på at gøre opmærksom på ordlyden af forligsaftalens afsnit 8(f), hvorefter vi bekræfter følgende (indsat herunder i sin originale ordlyd):

- 1) *The Settlement Agreement reflected the good-faith negotiation by the Covered Parties;*
- 2) *The Covered Parties' cooperation may result in the recovery by Skatteforvaltningen of additional funds from third parties; and*
- 3) *The Settlement Agreement was in the best interests of Skatteforvaltningen.*

Med venlig hilsen

Camilla Lindrum Bay

Chefkonsulent

Message

From: Camilla Lindrum Bay [Camilla.Bay@sktst.dk]
Sent: 12 Apr 2023 2:49:04 PM
To: PFI002@politi.dk
Subject: Orientation regarding settlement
Attachments: letter to NSK 120423.pdf

Dear Per

Please see the attached letter regarding the Danish Tax Agency settlement from May 2019.

Best regards

Camilla Lindrum Bay
Chief Consultant
Management Secretariat Antifraud Unit

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The Danish Tax Agency
Engelholm Allé 1, 2630 Taastrup
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This is how we handle your personal data
The Danish Tax Agency is a part of the Danish Tax Administration



Return Address: The Danish Tax Administration
Nykøbingvej 76, 4990 Sakskøbing

National Division for Special Crime (NSK)
Ejby Industrivej 125-135
2600 Glostrup
Attn: Chief Prosecutor Per Fiig
Email sent to: PFI001@politi.dk

Management Secretariat
Antifraud Unit

Helgeshøj Allé 9
2630 Taastrup

Telephone 72 22 18 18
SkaLdk

Date: 12 April 2023

Regarding the Danish Tax Administration's settlement with certain parties in the dividend case

Dear Per Fiig

As previously regularly reported, the Danish Tax Administration entered into a settlement agreement on May 28, 2019, with certain parties in the dividend case ("Covered Parties" in the settlement agreement) in order to resolve the claims that had arisen as a result of the submission of presumably illegitimate applications for reimbursement of dividend tax. In connection with the settlement's conclusion, SØIK was informed of the agreement, including specific terms relevant to SØIK.

On March 24, 2023, two of the settlement parties brought suit against the Danish Tax Administration in the District Court, Southern District of New York, alleging that the Danish Tax Administration has violated the settlement agreement by not providing certain information to SØIK.

As mentioned, the Danish Tax Administration has regularly informed SØIK (now NSK) about the information required in accordance with the settlement agreement, but nevertheless directs a new inquiry in order to draw attention to the wording of section 8(f) of the settlement agreement, whereby we confirm the following (inserted below in its original wording):

- 1) *The Settlement Agreement reflected the goodfaith negotiation by the Covered Parties;*
- 2) *The Covered Parties' cooperation may result in the recovery by Skatteforvaltningen of additional funds from third parties; and*
- 3) *The Settlement Agreement was in the best interests of Skatteforvaltningen.*

With best regards

Camilla Lindrum Bay

Chief Consultant